

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND)
COMPOUNDING PHARMACY, INC.)
LIABILITY LITIGATION)

MDL No. 2419

Master Dkt. No. 1:13-md-2419 (FDS)

THIS DOCUMENT RELATES TO:)
All Actions)

**INSIGHT HEALTH CORP.'S LIMITED OBJECTIONS TO
THE PROPOSED CASE MANAGEMENT ORDER**

COMES NOW Insight Health Corp. (wrongly sued herein as Insight Imaging Inc.) and submits its Objections to the Plaintiffs' Steering Committee's Proposed Case Management Order. The proposed order stays discovery of NECC and the Affiliated Defendants until further order of the court, to be revisited at each status conference. Insight opposes any stay of discovery of the Affiliated Defendants, the Unaffiliated Defendants, or others subject to the pending stay because, among other things, it cannot get information from these entities that is crucial to its defense in the state and federal court cases brought against Insight.¹

Dated this 16th day of September, 2013.

Respectfully submitted,

BONNER KIERNAN TREBACH & CROCIATA, LLP

/s/ Christopher E. Hassell

Christopher E. Hassell, Esq. (VSB No. 30469)

1233 20th Street, N.W., Suite 800

Washington, D.C. 20036

Telephone: (202) 712-7000

Fax: (202) 712-7100

Chassell@bonnerkiernan.com

Counsel for Defendant Insight Health Corp.

¹ Insight understands that NECC has been subject to a stay in the bankruptcy court.

CERTIFICATE OF SERVICE

I, Christopher E. Hassell, HEREBY CERTIFY that the foregoing Objection to the Proposed Case Management Order was filed electronically via the Court's electronic filing system on this 16th day of September, 2013. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

/s/ Christopher E. Hassell

Christopher E. Hassell